

July 22, 2019

The Honorable Dennis Montali
U.S. Bankruptcy Court for the
Northern District of California
Phillip Burton Federal Building
and U.S. Courthouse
Courtroom 17, 16th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *In re PG&E Corporation and Pacific Gas & Electric Company*
Case No. 19-30088 (DM)

Dear Judge Montali:

We write regarding a matter of concern to the Official Committee of Tort Claimants (the “TCC”) in the cases of PG&E Corporation and Pacific Gas & Electric Company (the “Debtors”).

On July 1, 2019, the Court entered an order (i) establishing October 21, 2019 as the bar date for filing proofs of claim, (ii) approving notices thereof and multiple claim forms, and (iii) authorizing the Debtors to implement their noticing plan (Dkt. No. 2806) (the “Bar Date Order”). Pursuant to the Bar Date Order, the Debtors have mailed notices of the bar date to claimants.

The TCC has observed certain anomalies regarding the implementation of the Debtors’ notice plan. For example, the TCC has observed instances where represented Fire Claimants have received the Standard Bar Date Notice and the Standard Proof of Claim Form, law firms have received notices and claim forms for Fire Claimants represented by other law firms, and law firms have received a number of notices that exceeds the number of Fire Claimants they represent. The Debtors have confirmed that 242 Ghost Ship claimants were originally served with the Standard Bar Date Notice and the Standard Proof of Claim Form and then later served with the Fire Claim Bar Date Notice and the Fire Claimant Proof of Claim.

The TCC has brought these and other noticing-related matters to the Debtors’ attention. The Debtors have agreed to provide specific information to the TCC regarding the bar date mailing in

response to the TCC's inquiries. The Debtors have informed the TCC that upon the completion of the bar date mailing, the Debtors will provide the TCC with the list of notice parties that were served with the Fire Claim Bar Date Notice and the Fire Claimant Proof of Claim, which list will also identify those parties that were also served with the Standard Bar Date Notice and the Standard Proof of Claim Form and, where applicable, the names and address of the law firms that represent such parties. The Debtors have informed the TCC that they will be in a position to provide this list by Tuesday, July 23, 2019.

The Debtors have further agreed to make additional information available to the TCC regarding the service of the bar date notices, including customer information on a confidential basis pursuant to the recently entered protective order (Dkt. No. 2807). Subject to the implementation of appropriate security measures, the Debtors have informed the TCC that they anticipate being able to provide access to this information by Friday, July 26, 2019.

The TCC is attempting to resolve the foregoing matters and ensure that the Debtors' noticing plan is implemented in accordance with the Bar Date Order. The TCC is not filing a motion or requesting a status conference regarding these matters at this time but is writing to bring these matters to the Court's attention should further action be necessary after the TCC has completed its review of the information provided by the Debtors.

Respectfully,

/s/ Eric Goodman

Eric Goodman

Counsel for the Official Committee of Tort Claimants

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